

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

INTORA, INC.,

Plaintiff

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendants.

Civil Case No. 1:23-cv-04504

Judge Thomas M. Durkin

Magistrate Judge Gabriel Fuentes

**AGREED MOTION FOR ENTRY OF
CONSENT JUDGMENT AND PERMANENT INJUNCTION**

Plaintiff, Intora, Inc. d/b/a Sportsheets International (Sportsheets), by its attorneys, hereby moves this Court for entry of the attached proposed Consent Judgment and Permanent Injunction against Shen Zhen Shi Liu Yi Wen Hua Shu Zi You Xian Gong Si, dba nihao2015; and shen zhen shi hui chuang xiang ke ji you xian gong si, dba lovenjoy (collectively, the “Listed Defendants”).¹ In support thereof, Plaintiff states as follows:

1. The Plaintiff and Listed Defendants have entered into a Settlement Agreement, which only resolves this action as between Sportsheets and the Listed Defendants, and does not affect the judgments entered against other defendants in this case.

2. As a part of the entered-into Settlement Agreement, Plaintiff and the Listed Defendants agreed to the form and entry of the attached proposed Consent Judgment and Permanent Injunction.

¹ This Motion for Entry of Consent Judgment and Permanent Injunction (“Motion”) may encompass one or more online stores or sellers or named defendants. For simplicity, the Motion will refer to the Listed Defendants in the plural, even if only one defendant is defined or contemplated or bound by the Motion.

WHEREFORE, Plaintiff, on behalf of the parties, requests the Court to enter the concurrently submitted proposed Consent Judgment and Permanent Injunction in its present form, which will only resolve this action as between Sportsheets and the Listed Defendants, and will not affect the judgments entered against other defendants in this case.

Dated: October 31, 2023

Respectfully submitted,

INTORA, Inc., dba Sportsheets International

By: /s/ James P. Muraff
One of its attorneys

James P. Muraff (ARDC #6225693)
Stephen J. Rosenfeld (ARDC #6216769)
Nicholas A. Kurk (ARDC #6292133)
McDONALD HOPKINS LLC
300 North LaSalle, Suite 1400
Chicago, IL 60654
Phone: (312) 280-0111
srosenfeld@mcdonaldhopkins.com
jmuraff@mcdonaldhopkins.com
nkurk@mcdonaldhopkins.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, James P. Muraff, an attorney, hereby certify that on October 31, 2023, I electronically filed the foregoing **AGREED MOTION FOR ENTRY OF CONSENT JUDGMENT AND PERMANENT INJUNCTION** with the Clerk of Court using the Electronic Case Filing System and in compliance with the General Order on Electronic Case Filing. As such, these documents were served on all parties who are deemed to have consented to electronic service.

By: /s/ James P. Muraff